DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814



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ALL-COUNTY LETTER NO: 96-19

REASON FOR THIS TRANSMITTAL
[] State Law Change
[] Federal Law or Regulation
Change
[] Court Order or Settlement
Agreement
[] Clarification Requested by
One or More Counties
[X] Initiated by CDSS

TO:

ALL COUNTY WELFARE DIRECTORS

ALL COUNTY CHIEF WELFARE FRAUD INVESTIGATORS

ALL DISTRICT ATTORNEYS

SUBJECT:

DPA 266 - FRAUD INVESTIGATION ACTIVITY REPORT

REFERENCE: ACIN I-31-95, ACL 92-111

DIVISION 26. SECTION 26-230

This transmits the revised DPA 266 -- Fraud Activity Report and instructions. The Information Services Bureau in conjunction with the Fraud Bureau worked with a work group composed of county and state staff in developing this new report. The revisions were made in an effort to improve the collection of accurate, meaningful Fraud information and to meet the Federal reporting requirements.

This report is effective with the July 1996 report month and is due the twelfth working day of the month following the report month.

Listed below are some of the major changes:

- A new column for Non-Assistance Food Stamps cases has been added.
- The categories under which to report completed investigations have been expanded.
- The special investigations units are allowed to report multiple dispositions on each case.
- Total Restitution Arranged has been changed to Total Fraud Overpayments Identified during the report month.
- Collections for the prior month are to be reported in an effort to improve the counties ability to submit the report more timely.
- The district attorneys are allowed to report multiple dispositions on the cases they prosecute.

All County Welfare Directo...
Page Two

Regional training will be conducted in May and June of this year by Rick Tibbetts of the Fraud Bureau and Virginia Uchida of the Information Services Bureau. More information will follow regarding the date, time and location of these training sessions.

The time and effort committed by the individuals from the county and state in revising the Fraud Activity Report and its instructions are commendable. Appreciation and gratitude are extended to all who assisted in this important endeavor.

Questions regarding the form and its instructions should be directed to Virginia Uchida of the Information Services Bureau at (916) 657-3289. For questions regarding the Fraud Programs, contact Rick Tibbetts of the Fraud Bureau at (916) 445-0031.

ARVIO A. GREVIOUS Deputy Director

Administration Division

Enclosures

c: CWDA

26-230 FRAUD INVESTIGATION ACTIVITY REPORT (FORM DPA 266)

26-230.01 CONTENT

The Fraud Investigation Activity Report (DPA 266) provides monthly data on cases where reasonable grounds to suspect fraud has resulted in a referral for investigation to the Special Investigation Unit (SIU) or the person designated to coordinate such referrals with the District Attorney (DA) or prosecuting authority, as well as cases independently acted upon by Investigating Units. Form DPA 266 covers case investigations in Aid to Families with Dependent Children (AFDC), combined Family Group (FG), Unemployed (U), and Foster Care (FC) programs; Public Assistance (PA) and Nonassistance (NA) Food Stamps; and Other Aid Programs. The form provides basic data on requests for investigation; disposition of cases by County Welfare Departments (CWD) and County DAs; dollar amounts of restitutions arranged, ordered and collected; dollar amounts of fines and forfeitures imposed; criminal complaints filed by prosecutors; and cases referred for Administrative Disqualification Hearings (ADH) and their dispositions.

26-230.02 **PURPOSE**

National and state emphasis on investigation and prosecution of persons who attempt to receive and who receive public assistance fraudulently require substantial attention by CWDs and County DAs. The Fraud Investigation Activity Report will show the amount of activity in each administrative unit and will be used to (a) evaluate the effectiveness of the recipient fraud policies; (b) evaluate the effectiveness of local agencies in applying policies; (c) to plan with local agencies on any needed changes and (d) complete the required federal fraud activity reports.

26-230.03 DISTRIBUTION

Information collected on the Fraud Investigation Activity Report is used to prepare the federally required annual Aid to Families with Dependent Children Program Fraud Activity Report (SSA 4110) and annual USDA Program and Budget Summary Statement (FNS 366B). In addition, this data is used in the California Department of Social Services (CDSS) Fraud Investigation Report (Series PA-4), published quarterly, and other special reports for the Administration and the Legislature.

26-230.04 DUE DATE

The CWD is responsible for ensuring that this report is fully completed. In counties where portions of this report are completed by other agencies, this report shall be reviewed and validated prior to transmittal to the CDSS Information Services Bureau. Reports are to be received in Sacramento on or before the twelfth working day of the month following the end of the report month. Send reports to:

California Department of Social Services Information Services Bureau 744 P Street, Mail Station 12-81 Sacramento, CA 95814-5512

26-230.10 FORM (DPA 266)

Complete county name, number, and month requested at the top of the pages of the Report Form. If an item is nonapplicable to your county, enter "NA" in the appropriate item box. No item should be left blank. If there is nothing to report for a specific item, please enter a "0".

Provide the name, title, and phone number of the person to contact should there be any questions about the data on the report. Enter the date the report is completed.

26-230.11 INSTRUCTIONS FOR COLUMNS

Each case of suspected fraud shall be reported in one of the following columns.

NOTE: The case shall be tracked from its original column coding in Part A, Section I and II, regardless of any primary aid group change resulting from the investigation. However, column shifts are allowed in Section III.

Column No. 1, AFDC. Report activity for all Aid to Families with Dependent Children cases (FG, U, and FC). In those instances where the suspected fraud affects both an AFDC cash grant and a Food Stamp case, the activity shall be reported as one case in each category.

Column No. 2, PA Food Stamps. Report activity on Food Stamp cases where the suspected fraud affects PA Food Stamps. If the suspected fraud affects a case in another program, the activity shall be reported as one case in each category.

Column No 3, NA Food Stamps. Report activity on Food Stamp cases where the suspected fraud affects NA Food Stamps. If the suspected fraud affects a case in another program, the activity shall be reported as one case in each category.

26-230.11 INSTRUCTIONS FOR COLUMNS (Continued)

Column No. 4, Total. Total number of each line item shall equal the sum of columns 1, 2, and 3 for PARTS A through E or explain in Part F. COMMENTS.

Column No. 5, All Other Programs. Report activity on investigations into any other aid programs including, but not limited to: General Relief, SSI/SSP, Special Circumstances, Interim Assistance, In Home Supportive Services and Guide Dog Allowance. In those instances where the suspected fraud affects both General Relief and Food Stamps, report one case in each category. All entries in this column must be itemized in Part F. COMMENTS.

26-230.20 PART A. INVESTIGATION ACTIVITY

This part of the report provides information on requests for investigation. An allegation of fraud is a request for investigation until an authorized official, or the equivalent, accepts the request with the intent of assigning it for investigative activity.

26-230.21 SECTION I: INVESTIGATION REQUESTS

This section provides information on the volume of requests for investigation received, rejected, or accepted.

- Line 1. **Total Requests Received During Month** Enter the total number of requests for investigation received during the report month for each aid program. For example, an investigation into a case with AFDC and PAFS will be counted as one case in Column 1 and Column 2.
- Line 2. Number of Requests Rejected During the Month Enter the total number of requests for investigation that were rejected during the report month. "Rejected" means that the request was received, reviewed, and will not be assigned for investigation.

25-230.21 SECTION I: INVESTIGATION REQUESTS (Continued)

Line 3. Number of Requests Accepted During the Month - Enter the total number of requests for investigation that were accepted during the report month. "Accepted" means those requests that are retained in the SIU or its equivalent with the intent of assignment for investigative activity.

Sub-items "a" through "n" break the total down by primary element of fraud. Multiple element requests shall be counted only once and should be coded by the element potentially causing the largest overpayment. Eligibility elements receive priority over grant level elements.

- a. **Early Fraud Prevention/Detection (EFP/D)** Enter the total number of requests to the Early Fraud Prevention/Detection program. <u>Include</u> those from eligibility worker staffed EFP/D programs.
- b. Income and Eligibility Verification System (IEVS) Enter total number of requests to the SIU emanating from an IEVS 155 or equivalent document. Include those from other automated matches, such as FTB and IRS.
- c. **Other Unreported Income** Enter the total number of unreported income requests not initiated by IEVS.
- d. **Homeless Assistance** Enter the total number of requests based on false claims of homelessness.
- e. Unreported Resources/Assets Enter the total number of non-IEVS requests concerning concealed or misreported assets/resources, such as real/personal property, bank accounts, cash, stocks, bonds, vehicles, etc.
- f. Family (Household) Composition Enter the total number of requests based on allegations that AU (or household) members are not in the home or are in the home but not eligible for inclusion in the grant. For example, an AFDC child is not in the home or not a full-time student or the household is receiving food stamps for three when the Food Stamp household is two.

NOTE: Requests alleging the absent father is in the home should also be reported under this category.

25-230.21 SECTION I: INVESTIGATION REQUESTS (Continued)

- g. Duplicate/Replaced Warrants/Lost Food Stamps Enter the total number of requests based on duplicate/replaced warrants and/or lost Food Stamp coupons or Electronic Benefit Transfer (EBT) material.
- h. **Duplicate (Multiple)** Aid Enter the total number of requests for an investigation alleging an individual, or groups of individuals, are receiving aid under two or more case numbers, in one or more districts, counties and/or states.
- i. Forgery Enter the total number of forgery investigation requests.
- j. **Residence** Enter the total number of requests based on false residency.
- k. **Fictitious Identity** Enter the total number of requests based on fictitious identity.
- 1. **Food Stamp Trafficking** Enter the total number of requests alleging the illegal sale, purchase or bartering of ATPs/Food Stamp coupons or EBTs.
- m. Internal Affairs Enter the total number of internal affairs investigation requests. If you are able to link the investigation to a specific program report it in the applicable program. If not, report it in "All Other Programs".
- n. Other Enter the total number of other requests. Explain the allegations in Part F. COMMENTS. Cases alleging that the deprivation of incapacity does not exist should be reported here.

26-230.22 SECTION II. INVESTIGATION CASELOAD

This section provides information on the volume of investigations available and completed. The language in Line 6 below corresponds to that of the SSA 4110 (Aid to Families with Dependent Children Fraud Activity Report) which is the required annual federal AFDC Fraud Activity Report and provides required data for the FNS 366B, the required Food Stamp fraud counterpart.

Line 4. Investigations Pending Beginning of Month - Enter the total number of accepted investigations pending from last month. This item should agree with PART A, Section II, Line 7 of the prior month's report. If not, enter the correct data in PART A, Section II, Line 4 of the current report and provide the reason for the discrepancy in Part F. COMMENTS.

- 26-230.22 SECTION II. INVESTIGATION CASELOAD (Continued)
- **NOTE**: For reporting on the **initial** report only, this figure would be taken from Part A, Section II, Line 10 of the prior month's report.
- Line 5. **Total Investigations Available During Month** Enter the sum of Item 3 plus Item 4.
- Line 6. **Total Investigations Completed During Month** Enter the total number of investigations completed during the report month.
 - a. Evidence Sufficient to Support an Allegation of Fraud Enter the number of cases for which there is sufficient evidence to support a question of fraud. This is the sum of Line 1 and Line 2 below. Since multiple dispositions will <u>not</u> be reported in this section, the numbers will not be the same as in Part A, Section III, Investigation Results. For example, one or more entries in Section III, Lines 8-16 will result in one case count on this line.
 - Cases Referred for Prosecution Enter the number of cases referred to the agency empowered to prosecute.
 Report Disqualification Consent Agreements (DCA) here.
 This should agree with the amounts in Section III, Line 11.
 - 2. Cases Not Referred for Prosecution Enter the number of cases <u>not</u> referred to the agency empowered to prosecute. A <u>case</u> should be reported here if it was reported as a disposition in Part A, Section III, Lines 8-10 and 12-16.
 - b. Evidence Not Sufficient to Support an Allegation of Fraud Enter the total number of cases for which a decision was made that
 the evidence was insufficient to support a question of fraud. This
 should agree with the total of Lines 17, 18, and 19 in Part A,
 Section III.
- Line 7. Total Investigations Pending at End of Month (Item 5 minus Item 6) Enter the total number of investigations pending at the end of the report
 month.

26-230.23 SECTION III: INVESTIGATION RESULTS

Report the results of all SIU investigations closed during the report month. This section tracks the results of cases in Section II, however, the numbers will not be the same since a case may result in multiple outcomes. Example: A case resulting in a restitution action, and in which benefits are reduced, would be reported in Line 13 and Line 9 or Line 14.

- Line 8. **Denials (Early Fraud)** Enter the total number of completed Early Fraud investigations resulting in a denial of the application. In these cases, no benefits have been issued.
- Line 9. **Benefits Reduced (Early Fraud)** Enter the total number of completed Early Fraud investigations resulting in a reduction of benefits. Example: The investigation determined that the AU (Household) was 2 not 3 because a child was not living in the home.
- Line 10. **Discontinuances (Early Fraud)** Enter the total number of completed Early Fraud investigations resulting in a discontinuance of benefits. These occur, particularly in the Homeless Assistance, Emergency Aid, and Expedited Food Stamps Programs, where an entitlement is issued prior to completion of the Early Fraud investigation.
- Line 11. **Referred for Prosecution** Enter the total number of cases referred to the DA for final disposition through his/her authority. This number is normally the same as Line 6.a.1. in Section II. If it does not agree, explain in Part F. Comments.
- Line 12. Referred to Administrative Disqualification Hearing (ADH) Enter the total number of cases referred for ADH.
- Line 13. **Restitution Action** Enter the total number of cases in which a restitution action is taken, i.e., agreement to repay.
- Line 14. **Benefits Reduced** Enter the total number of non-Early Fraud cases resulting in a reduction of benefits.
- Line 15. **Benefits Discontinued** Enter the total number of non-Early Fraud cases resulting in benefits being discontinued.
- Line 16. Fraud Found, No Adverse Financial Impact Enter the total number of cases in which the investigation found that information had been withheld or facts misrepresented, but the withheld or misrepresented information resulted in no adverse financial impact. Example: The investigation found unreported assets; however, these assets did not result in the AU (Household) having their benefits reduced or being ineligible.

26-230.23 SECTION III: INVESTIGATION RESULTS (Continued)

- Line 17. **Allegation Unfounded** Enter the total number of cases where the investigation found there was no fraud.
- Line 18. **Insufficient Evidence** Enter the total number of cases where the investigation failed to determine whether a violation occurred.
- Line 19. **Expiration of Statutes** Enter the total number of cases where the investigation is terminated as a result of the expiration of the statute of limitation.
- Line 20. Other Enter the total number of investigations disposed of for reasons other than listed in items "8" through "19". Internal Affairs dispositions shall also be reported here. Case dispositions in this line shall be explained in Part F. COMMENTS.

26-230.24 SECTION IV. FRAUD OVERPAYMENT AND FINE DOLLAR AMOUNTS

- Line 21. Total Fraud Overpayments/Overissuances Identified (Dollar Amounts) Enter the total dollar amount of fraud overpayments and overissuances identified due to completed investigation activity. Any adjustments to this line should be entered in the month that the information was received. Example: A \$200 overpayment was reported in January 1995 and the county was informed that the overpayment was reduced to \$150 in March 1996. The amount that was increased or decreased should be reported on the March 1996 DPA 266 report with an explanation in the Part F. COMMENTS. In this case, the total identified overpayment/overissuance amount would be reduced by \$50 in the March 1996 report month.
- Line 22. **Fines/Forfeitures (Dollar Amounts)** Report the total dollar amounts of fines/forfeitures levied through civil or criminal prosecution activity in the "Total" column.

26-230.30 PART B. PROSECUTION ACTIVITY

This part of the report provides information on fraud referrals received by the DA and the dispositions of those referrals.

26-230.31 SECTION I. PROSECUTION ACTIVITY

- Referrals Pending Beginning of Month Enter the total number of cases pending dispositions from last month. This item should agree with Part B, Section I, Line 5 of the prior month's report. If not, enter correct data in Line 1 of the current report and note the reason for the discrepancy in Part F. COMMENTS.
- Item 2. Referrals Received During Month Enter the total number of cases received during the report month.
- Item 3. Total Referrals Available During Month Enter the sum of Item 1 plus Item 2.
- Line 4. **Total Referrals Processed During the Month.** Enter the total number of cases for which a criminal complaint or indictment was filed during the report month or for which a decision was made not to prosecute. Sum of Line 4a and Line 4b below.
 - a. **Prosecutions Filed** Enter the total number of cases for which a criminal complaint or indictment or other actions (e.g., diversions, citation hearings) was filed during the report month. This may differ from the number of cases referred to the DA as reported in Section III, Line 11.
 - b. **Decision Made Not to Prosecute** Enter the total number of cases during the report month where the decision was made by the prosecuting authority not to prosecute. Include in this category all those cases in which there was a failure to indict.
- Line 5. Referrals Pending at End of Month Enter the total number of referrals pending at the end of the report month. This item is the difference between Item 3 and Item 4.

26-230.32 SECTION II. PROSECUTION OUTCOMES

This part of the report provides information on the outcomes of the prosecutions filed in Section I above. If the prosecution results in more than one outcome, all should be reported. Because multiple dispositions will be reported in this section (Part B, Section II), the numbers will not be the same as in Part B, Section I above.

26-230.32 SECTION II. PROSECUTION OUTCOMES (Continued)

- Line 6. **Convictions** Enter the total number of filed complaints/indictments where there was a criminal conviction, from either a guilty plea, nolo plea, diversion, or trial. Include complaints/indictments convicted in part and acquitted in part.
- Line 7. Administrative Action Enter the number of filed complaints/indictments disposed of through a restitution agreement arranged as approved by the DA and disposed of in lieu of criminal indictment other than those reported in Line 8 below. Include final dispositions through grant adjustments, agreements to repay, citation hearings, civil and small claims court judgments, full cash restitution made, court diversion programs, etc.
- Line 8. **Disqualification Consent Agreement** Enter the total number of filed complaints disposed of through a Disqualification Consent Agreement.
- Line 9. Charge Pleaded A charge pleaded exists when more than one filed complaint/indictment against a person/defendant is accepted by the DA and the DA agrees to drop one or more welfare charges in order to obtain a guilty plea on the other charge. The program in which the charge is dropped will be reported as "Charge Pleaded."
- Line 10. **Dismissals** Enter the total number of filed complaints/indictments disposed of during the report month by dismissal after issuance of a complaint, including those dismissed by motion of the court, either prior to or at the trial, but only if the complaint is not remanded for administrative disposition.
- Line 11. Acquittals Enter the total number of filed complaints/indictments disposed of by an acquittal.
- Line 12. **Declinations** Enter the total number of filed complaints/indictments declined by the DA and on which no other action will be taken. A preliminary decision not to prosecute pending further investigation is not a declination. Such complaints shall be carried pending until further investigation is completed and a final disposition made. However, if the DA declines to take legal action on a complaint/indictment after accepting the referral, and the investigation unit has included a valid and acceptable restitution arrangement in the investigation report, the disposition of the complaint/indictment should be reported as an approved restitution arrangement in Part B, Line 7, Administrative Action and not as disposed of through a declination to take legal action.

26-230.32 SECTION II. PROSECUTION OUTCOMES (Continued)

- Line 13. **Expiration of Statutes** Enter the total number of filed complaints/indictments disposed of due to the Statute of Limitations or because the Statute has or will expire soon.
- Line 14. Other Enter the number of filed complaints/indictments disposed of for reasons other than sub-item "6" through "13". Case dispositions shall be specified by type in Part F. COMMENTS.

26-230.50 PART C. ADMINISTRATIVE DISQUALIFICATION HEARING ACTIVITY

This part of the report provides information on referrals for Administrative Disqualification Hearings. Include referrals for all ADHs, whether held at the state or county level.

- Line 1. **Referred for ADH** Enter the total number of persons referred, by program, for an Administrative Disqualification Hearing that was requested in the report month. Include state and local level ADH referrals.
- Line 2. Waivers Enter the total number of ADH waivers here.
- Line 3. **Upheld Convictions** Enter the total number of cases found guilty of IPV during the report period. Upheld means the ADH was found in favor of the requesting agency.
- Line 4. Acquittals Enter the total number of cases found not guilty of committing an IPV during the report period. Acquittal means the ADH found for the defendant.
- Line 5. **Decision Pending** Enter the total number of cases for which the cases were heard but the court's decision was not formally rendered before the end of the report period.
- Line 6. Program Dollars Enter the estimated dollar value of program loss that may be recovered in Item 3 of this part. Program loss means the associated overpayment/overissuance for each conviction.

26-230.60 PART D. PERSONS DISQUALIFIED

This part of the report provides information on persons disqualified.

26-230.60 PART D. PERSONS DISQUALIFIED (Continued)

- Item 1. **Persons Disqualified as a Result of Court Prosecutions** Enter the total number, by program, of people who were disqualified in the month through court action. Disqualification Consent Agreements are considered court actions as are civil and federal court findings.
- Item 2. Administrative Hearing Disqualifications Enter the total number of people who were disqualified in the month, by program, as a result of Administrative Disqualification Hearings, or their equivalent. All "waiver of hearing" disqualifications should also be recorded here.

26-230.70 PART E. COLLECTIONS

Item 1. Total Collected During The Prior Report Month (Dollar Amounts) Enter the total dollar amount of fraud overpayments collected by or for the
County Welfare Department during the prior month. Report only those
dollar amounts that reflect restitution for fraud overpayments or
overissuances. Grant adjustments should be included in this amount if
they reflect restitution for fraud overpayments or overissuances. For the
purposes of this report, it is a fraud collection if it is from an overpayment
linked to investigation referrals found to have committed fraud.

NOTE: In a combined AFDC/Food Stamp investigation where the investigation is tracked in both the AFDC and Food Stamp columns, the restitution agreed to or ordered is to be reported in applicable columns where the AFDC overpayment and the Food Stamp overissuance amounts are separately identified.

26-230.80 PART F. COMMENTS

Discrepancies, special comments or explanations regarding data in this report are to be made in space provided. Additional pages may be attached as necessary.

FRAUD INVESTIGATION ACTIVITY REPORT

County Name:	County #		For Month Ending (Month, Day, Year)		
PART A. INVESTIGATION ACTIVITY	AFDC (1)	PA FOOD STAMPS (2)	NA FOOD STAMPS (3)	TOTAL (4)	ALL OTHER PROGRAMS (5)
ITEM SECTION I, INVESTIGATION REQUESTS	<u> </u>	(∠)	(3)	(4)	(5)
Total Requests Received During Month					
2. Total Requests Rejected During Month	6	7	₿.	!	
Total Requests Accepted During Month	11.	12	13	1	1
(Sum Items 3a through 3n)	16	17	18	1	:
 a. Early Fraud Prevention/Detection (EFP/D) 	21	22	23	2.	4[
b. Income and Eligibility Verification System (IEVS)	26	27	28:	2	1
c. Other Unreported Income					
d. Homeless Assistance	31	2		3	
e. Unreported Resources/Assets	36	37	38	3	
f. Family (Household) Composition	41	42	43	4	4
g. Duplicate/Replaced Warrants/Lost Food Stamps	46	47	48	4	9
	51	52	53	6	4
h. Duplicate (Multiple) Aid	56	57	58	5	9
i. Forgery	61	62	63	6	4
j. Residence	66	67	68	6	9
k. Fictitious Identity		72	73	7	
I. Food Stamp Trafficking	n Section 1				1000
m. Internal Affairs	76	77	78:	7	9
n. Other	81	82	83:	8	4
SECTION II. INVESTIGATION CASELOAD	86	87	88	8	9
Investigations Pending Beginning This Month (Part A, Item 7 last month, or explain in Part F)					1
5. Total Investigations Available During Month (Item 3 plus 4)	91	92	93	9	
6. Total Investigations Completed During Month	96	97	96	9	9
(Sum Items 6a and 6b)	101	102	103	. 10	4
 a. Evidence Sufficient to Support an Allegation of Fraud (Sum Line 1 and Line 2 below) 	106	107	108	10	9
Cases Referred for Prosecution					
2. Cases Not Referred for Prosecution	1111	112	113	្រា	4
b. Evidence Not Sufficient to Support an Allegation of Fraud	116	117	118	- 11	9-
	121	122	123	12	4
7. Investigations Pending at End of Month (Item 5 minus Item 6) SECTION III. INVESTIGATION RESULTS	126	127	128	12	9
8. Denials (Early Fraud)	131	132	133	13	iA.
9. Benefits Reduced (Early Fraud)				13	
10. Discontinuances (Early Fraud)	136			·	
11. Referred for Prosecution	141				
12. Referred to Administrative Disqualification Hearing (ADH)	145			1	
13. Restitution Action	151			1	
14. Benefits Reduced (Not Early Fraud)	156	15	158	10	19

County Name and #

Report Month

205	202	203	(4)	(5)
205	207			
211		208		
1	212	213	209	210
216				
	217	218	219[220
221	2222	223	224	226
				230
238	237	238	239	240
241	242	243	244	245
246	247	248	249	250
251	252	253	254	255
256	257	258	259	260
281	262	263	264	269
266	267	268	259	270
271	272	273	274	275
276	277	278	279	280
281	282	283	284	28
				290
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				301
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			ALVANIA III.	31:
316	317	318	319	
321	322	323	324	32

	241 246 251 256 261 268 271 276 281 296 301 306	231 232 236 237 241 242 246 247 251 252 256 257 261 262 266 267 271 272 276 277 281 282 286 287 291 292 296 297 301 302 306 307 311 312	231 232 233 236 237 238 241 242 243 246 247 248 251 252 253 256 257 258 261 262 263 266 267 266 271 272 273 276 277 278 281 282 283 296 287 288 301 302 303 306 307 306 311 312 313 316 317 318	231 232 233 234 236 237 238 239 241 242 243 244 246 247 248 249 251 252 253 254 256 257 258 259 281 282 263 284 286 267 268 259 271 272 273 274 276 277 279 279 281 282 283 284 286 287 286 289 291 292 293 294 298 297 298 299 301 302 303 304 306 307 306 309 311 312 313 314 316 317 318 319

PART F. COMMENTS: